

The current identification rules are satisfactory and need no change. I am opposed to RM-11347 for the following reasons:

1. Increasing the ID requirements over the current level will result in either an undue regulatory enforcement burden on the FCC or, if unenforced, lead to the idea that FCC regulations can be flouted with impunity.
2. The author states that many operators, especially on FM repeaters, do not identify at the proper intervals or at all. The current rules are quite clear on the identification requirements. Changing to more stringent ID requirements will not change people's habits unless there is stringent enforcement. Those who violate the rules will continue to do so even if the rules are changed unless it is coupled with strict enforcement.
3. The current rules, despite the author's opinion to the contrary, are quite clear and do not allow room for "interpretation" of what constitutes proper identification.
4. The author wishes to require that stations give not only their call sign but that of the station with which they are in communication. This is quite impractical for the reasons listed here.
 - a. In large roundtables or nets, it could take up to 10 minutes to identify one's own station and list every other station on frequency. Once that was complete, they'd have to do it all over again. No other communication except transmission of call signs could occur.
 - b. Repeaterers would be unable to follow such a procedure. Currently the rules do not allow exceptions to the identification rules for repeaters.
 - c. Stating the other station's call sign does not satisfy that other station's requirement to ID. So transmitting both ID is unnecessary since they should be transmitting their own identification under the appropriate intervals as defined by their licensing body.
5. Specifying that the station precede its ID with the specific words "this is" or "from" for voice or "de" on CW is excessively detailed. Micromanagement or microregulation to this degree is simply unnecessary. The call sign alone is sufficient.

The problems in identification that do admittedly occur from time to time in the amateur radio service result from a violation of the rules. Changing the rules will not improve the situation.